



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
9311 GROH ROAD
GROSSE ILE, MI 48138

NOV 16 2011



MEMORANDUM

SUBJECT: **ACTION MEMORANDUM:** Request for Approval and Funding of a Time-Critical Removal Action at the Rockford Paperboard Site, City of Rockford, Kent County, Michigan (Site ID # C550)

FROM: Jeffrey W. Kimble, On-Scene Coordinator (OSC)
Emergency Response Branch-1
Emergency Response Section-2

THRU: Jason El-Zein, Chief
Emergency Response Branch-1

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$322,310 to conduct a time-critical removal action at the Rockford Paperboard Site in the City of Rockford, Kent County, Michigan. The time-critical removal action proposed herein will mitigate the threats from drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers of corrosive, flammable, and toxic wastes by arranging for off-site disposal. There are no nationally significant or precedent setting issues associated with the proposed response at this non-NPL site.

The Action Memorandum would serve as approval for expenditures by EPA, as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the site. The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: MIN000510634
State ID: N/A

Category: Time-critical

The site operated as paperboard/carton box production facility since 1940 until 2001. The Site is now abandoned. The Site contains drums of characteristically hazardous flammable and corrosive wastes.

A. Site Description

1. Removal site evaluation

On June 13, 2011, U.S. EPA On-Scene Coordinators (OSC) Jeffrey Lippert and Jeffrey Kimble, United States Environmental Protection Agency (U.S. EPA) Environmental Scientist Keith Lesniak, and OTIE Superfund Technical Assessment and Response Team (START) members Naren Babu and Elisa Walker mobilized to site and met Michigan Department of Natural Resources (MDNR) representative Jennifer Wolf and Rockford Paperboard representative Craig Linderman to conduct site assessment activities. Upon entering the building, Mr. Linderman noticed recent vandalism in the building and informed local police. The Kent County Sheriff arrived on site and conducted a site walkthrough and collected fingerprints. A health and safety meeting was held to review the Health and Safety Plan (HASP) and to discuss proposed sampling activities.

U.S. EPA collected samples from inside the building in Level "B" PPE for field screening. A total of five drum samples were screened with Ahura Scientific TruDefender® and FirstDefender® instruments. The drums were labeled RP-DRUM-01, RP-DRUM-02, RP-DRUM-03, RP-DRUM-04, and RP-DRUM-05. Results of the field screening tests are presented below in Table 1.

Table 1 Field Screening Results Rockford Paperboard Assessment Rockford, Michigan		
Drum	TruDefender®	FirstDefender®
RP-DRUM-01	Water	No Match
RP-DRUM-02	CAS:110-91-8/ UN:2084/C4H9ON	No Match
RP-DRUM-03	No Match	Ethylene glycol-5% Cyclohexylactylone-3% Water-80%
RP-DRUM-04	No Match	Water-83% Vanadium(V)oxyfluoride-6% N,N-Diglycidyl-4-glycidyoxy aniline-2%
RP-DRUM-05	No Match	No Match

A total of four solid samples and seven liquid samples were collected. Results are presented below in Table 2.

Table 2
Sampling Summary
Rockford Paperboard Site Assessment
Rockford, Michigan

Sample ID	Sample Description	Laboratory Result
RP-AS-01	Pieces of potential ACM in the basement level the new boiler room (Photo# 9)	Asbestos
RP-SOLID-01	Composite soil sample from the former coal storage area west of the old boiler room and north of the clarifier	Total &TCLP VOCs, Total &TCLP SVOCs, Total &TCLP MI 10 Metals
RP-SOLID-02	Sludge material collected from trench (possible rotten pulp) in the Paperboard Machine Room	Total &TCLP VOCs, Total &TCLP SVOCs, Total &TCLP MI 10 Metals, and PCBs
RP-SOLID-03	Dark sludge with purple color to it collected from trench in the Paperboard Machine Room	Total &TCLP VOCs, Total &TCLP SVOCs, Total &TCLP MI 10 Metals, and PCBs
RP-SOLID-04	Pieces of material in room in the basement level of the new boiler room and west of the Pulping Area (Photo# 10)	Total &TCLP VOCs, Total &TCLP SVOCs, Total &TCLP MI 10 Metals
RP-DRUM-01	Liquid Sample from Drum #01 in drum/tank area	pH
RP-DRUM-02	Liquid Sample from Drum #02 in drum/tank area	pH, flashpoint
RP-DRUM-03	Liquid Sample from Drum #03 in drum/tank area	pH
RP-DRUM-04	Liquid Sample from Drum #04 in drum/tank area	pH, flashpoint
RP-DRUM-05	Liquid Sample from Drum #05 in drum/tank area	Total & TCLP VOCs, pH, flashpoint
RP-DRUM-06	Liquid Sample from poly can labeled HCL from the Chemical Lab	pH
RP-DRUM-07	Liquid Sample from poly tote in the Warehouse	Total VOCs, pH, and flashpoint

Samples RP-DRUM-0 and RP-DRUM-07 were collected from drums in the chemical storage area. . Laboratory results for pH for these samples were 13.7 standard units (SU) and 12.6 SU respectively. RP-DRUM-06 was collected from the concentrated hydrochloric acid can in the lab. According to the laboratory, the pH of drum sample RP-DRUM-06 is reported as "non-detect" because the pH of the sample was lower than what the laboratory could measure. According to 40 C.F.R. § 261.22, a substance is hazardous for the characteristic of corrosivity if its pH is less than or equal to 2 or greater than or equal to 12.5. . Laboratory results for ignitability for samples RP-DRUM-05 and RP-DRUM-07 were 140° F and 140° F. As defined by 40 C.F.R. § 261.21, substances with a flashpoint below 140° F, are characteristically hazardous based on ignitability. The laboratory results for acetone in sample RP-DRUM-07 was 200 mg/L. Acetone is defined as a hazardous substance and also defined as toxic (non-acute) hazardous waste with U002 code.

Soil sample RP-SOLID-01, collected from the former coal storage area and Sludge samples RP-SOLID-02 and RP-SOLID-03, collected from the trenches in the paperboard machine room had several detected VOCs, SVOCs and metal but none of the TCLP results exceeded the 40 CFR Section 261.24 regulatory limits for defining hazardous characteristics.. The dry pulp sample, RP-SOLID-04, also had several detected results for SVOCs and metals. Detected compounds in solid samples include arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver, zinc, acetone, trans 1,2-dichloroethene, o-xylene, anthracene, benzo(a)anthracene, bis(2-ethylhexyl) phthalate, butyl benzyl phthalate, fluoranthene, N-Nitrosodiphenylamine, phenanthrene and pyrene

2. Physical location

The Rockford Paperboard Site (Site) is located at 7700 (aka 7734) Childsdales Avenue in the City of Rockford, Kent County, Michigan, 49341. Coordinates for the site are 43.102421 degrees latitude and -85.577036 degrees longitude.

The area surrounding the Rockford Paperboard Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Rockford Paperboard Site is in a census tract with a score of 8 (Attachment 3). Therefore, Region 5 does not consider this site to be a high-priority potential EJ area of concern.

3. Site Characteristics

The site is comprised of a vacant paper mill building with ancillary equipment, parking areas, lawn areas and wooded areas adjacent to the Rogue River. The site occupies an approximate area of 17.58 acres in an industrial setting and is area and is surrounded by Childsdales Avenue to the northwest, a wooded area to the northeast, and the Rogue River to the southeast and southwest.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

As described in Tables 1 and 2, the presence of hazardous substances existing at the site has been documented through field screening and laboratory analysis. The site evaluation documented 30 small containers, 1 cylinder, 1 tote of solvent, 3 pallets of CR-800 Titanium Dioxide (Manufactured by Kerr McGee), 1 pallet Polyvinyl Alcohol, 1 tote containing a mix of Cyclohexamine [108-91-8] and NN Diethylsnolsmine [100-37-8]), 73 drums of unknown materials, 2 1,000-gallon tanks of unknown wastes, 10 300-gallon totes of unknown wastes, 7 bags of Polyethylene glycol 3350 granules, and 4 large totes of liquid waste. There is also a chemical laboratory.

The site building is in various states of disrepair. Holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of

site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete, which can lead to trespassers. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Rogue River lies less than 100 feet from the rear of the building.

5. NPL status

The site is not on the National Priorities List (NPL), nor is it reasonably expected to be proposed for the NPL.

6. Maps, pictures and other graphic representations

A figure detailing the location of the site is included in the attached Site Location Map (Figure A-1). A figure detailing site features such as building footprint, site boundaries, and river location is presented in the attached Site Features Map (Figure A-2). Attachment 3 details the Environmental Justice analysis for the Site.

B. Other Actions to Date

1. Previous actions

None. The company that formerly operated the facility went out of business and the facility has been shut since then.

2. Current actions

Not applicable

C. State and Local Authorities' Roles

1. State and local actions to date

The Michigan Department of Environmental Quality (MDEQ) assisted U.S. EPA with the assessment activities by providing field instrumentation and an operator for the equipment. MDEQ referred the site to U.S. EPA and requested that U.S. EPA assess the site and conduct a subsequent Time-critical Removal Action if warranted.

2. Potential for continued state/local response

State and local government assistance will be required during the removal action for those governmental functions that are inherently state and local.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions remaining at the site present substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. §300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Laboratory analytical and field screening results show that the wastes in drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers is hazardous. Several drum samples had a pH greater than 12.5 SUs, one drum sample was so acidic an accurate measurement was not able to be obtained, and lab-grade acids were also found to be present. Numerous drums showed labeling or indicated via field instrumentation that they hold volatile organic compounds. Two drum samples met the criteria to be considered ignitable waste (D001). The site showed signs of trespassing and vandalism. Overall, the potential for exposure to hazardous substances stored at the site is high, especially considering that the on-site building is no longer occupied and vandals have accessed the interior of the facility.

Other potential chemical hazards on site include:

- Numerous miscellaneous containers containing unknown liquids including an on-site chemical laboratory;
- Approximately twenty 300-gallon totes containing unknown liquids; and
- Two above-ground storage tanks containing unknown liquids.

The site has unrestricted access and vandals have breached doors and/or windows to the building itself. During the assessment, a large amount of graffiti and other trespass evidence was noted.

Some wastes on site are not properly containerized or properly labeled. None of the hazardous waste or potentially hazardous material containers has secondary containment. A number of the containers documented at the site are deteriorated, corroded, and/or bulging. Potential releases of hazardous waste from the site could, in addition to directly affecting nearby populations, also migrate off-site. A sensitive waterway, the Rogue River, is adjacent to the rear of the property. Due to waste storage conditions and the potential for trespassers, hazardous waste on site could be released. Potential exposure through each of these migration pathways could cause imminent endangerment to human health, welfare, or the environment.

Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers containing hazardous wastes or potentially hazardous materials inside the main

building could become compromised and secondary containment is not present. Intentional or accidental releases of hazardous waste from the site could enter the Rogue River which is less than 100 feet from the rear of the building. A release to this water body would contaminate other nearby surface water bodies, and potentially affect drinking water supplies and sensitive ecosystems.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

Several drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers contain hazardous waste or potentially hazardous chemicals, including strong acids, strong bases, and ignitable liquids are present at the site. Many of the drums are in poor condition, open, corroded and/or bulging. As described in section A.1., several liquid samples from site drums were identified as characteristically hazardous wastes. The building is unsecure and unwatched and has a likelihood of being broken into and vandalized by trespassers. Weathering and activity of trespassers could cause containers to breach and the contents of the containers could thereby be released into the environment.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Southeastern Michigan summers and winters result in vaporization and freeze-thaw cycles. These weather conditions could cause the subsequent breach of containment and the release of chemicals at the site. Currently, the building has no heat as the gas service was cut-off. It is exposed to adverse weather conditions such as high winds, rain, sleet, and snow. There are also numerous holes in the roof where precipitation is entering the building. Severe weather conditions have and will continue to contribute to the deterioration of the building and the containers and drums stored there, creating the potential for additional releases and/or migration of hazardous substances.

Threat of fire or explosion.

The threat of fire or explosion exists due to the presence of ignitable and combustible liquids in containers. Two liquid samples collected had flash points at or below 140° F, which is considered characteristically hazardous as defined at 40 C.F.R. § 261.21. Several drums, notably the ones containing D001 waste, were observed to be pressurized during the assessment as vapors hissed from the bung as the drum was opened for sampling. Summer temperatures in Michigan can easily reach above 90° F, which could result in the presence of flammable vapors. The building is unwatched, which could lead to potential trespassing and vandalism. As temperatures decrease in autumn and winter, the potential increases for vagrants to enter the buildings and start fires for warmth. A fire could produce toxic gases, irritants, hazardous smoke, and contaminated fire suppression water runoff.

The availability of other appropriate federal or state response mechanisms to respond to the release.

No other Federal or State response mechanisms are available to respond in a timely manner. On February 24, 2011, MDEQ Remedial Division Supervisor David O'Donnell requested U.S. EPA in dealing with the hazardous wastes located at the site.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances at the site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on site will include:

- a) Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
- b) Develop and implement a Site Work Plan and Site Security Plan;
- c) Inventory, perform hazard characterization, and sample suspected hazardous substances contained or uncontained in compliance with a site-specific QA/QC Plan;
- d) Address other contaminated media in accordance with Applicable, Appropriate, and Relevant Requirements to the extent practicable;
- e) Consolidate and package hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- f) Dismantle and/or decontaminate contaminated structures as necessary;
- g) Transport and dispose of characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP. However, elimination of threats presented by hazardous substances at the site is expected to minimize the need for post-removal site control.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance

The proposed action will not impede future actions based on available information. The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action with respect to the release or threatened release concerned. No further action is anticipated once the proposed removal action is completed.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

All identified applicable or relevant and appropriate requirements (ARARs) of federal and state law will be complied with to the extent practicable considering the exigencies of the situation. The OSC sent a letter dated September 7, 2011, requesting ARARs to Ms. Nancy Johnson, MDEQ, Grand Rapids Office.

Federal

Federal ARARs for this Site primarily include, but are not limited to: 40 C.F.R. §101 (14), §121 (d)(3), §262.11, §300.440, and §300.415 (2).

State

On September 8, 2011, OSC Kimble received a response from MDEQ Nancy Johnson on the ARAR request sent to her attention. Ms. Johnson provided the documented titled "Michigan's Chemical, Action and Location Specific Response Actions Summary (Revision 1: January 1, 2000)." This document summarizes and cites all potential State of Michigan environmental laws and regulations.

5. Project schedule

The proposed activities listed in Section V of this memorandum will require an estimated 40 on-site working days to complete.

6. Estimated costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<u>Extramural Costs:</u>	
<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Allowance Costs	\$ 219,490
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 60,780
Subtotal Extramural Costs	\$ 280,270
Extramural Costs Contingency (15% of Subtotal Extramural Costs)	\$ 42,040
TOTAL REMOVAL ACTION PROJECT CEILING	\$ 322,310

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the site conditions, the nature of the hazardous substances and pollutants or contaminants documented on-site, and the potential exposure pathways to nearby populations described in Sections II, III, and IV above, actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

$$(\$322,310 + \$55,280) + (62.76\% \times \$377,590) = \$614,565$$

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$614,565¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Rockford Paperboard Site in Rockford, Kent County, Michigan. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site, see Attachment 2. Conditions at the site meet the NCP § 300.415(b)(2) criteria for a time-critical removal action and I recommend your approval.

The total removal project ceiling, if approved, will be \$322,310. Of this, an estimated \$261,530 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: *Richard C. Kel*
Director, Superfund Division

DATE: 11-15-11

DISAPPROVE: _____
Director, Superfund Division

DATE: _____

Enforcement Addendum

Figures:

- A-1; Site Location Map
- A-2: Site Features Map

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 27, 2008. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Attachments:

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index
3. Region 5 EJ Analysis
4. Independent Government Cost Estimate

cc: Sherry Fielding, U.S. EPA, 5104A
fielding.sherry@epa.gov
Michael Chezik, U.S. Department of the Interior, w/o Enf. Addendum
michael_chezik@ios.doi.gov
Dan Wyant, Director, MDEQ, w/o Enf. Addendum
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Lansing, MI 48933
Bill Schuette, Michigan Attorney General, w/o Enf. Addendum
P.O. Box 30212
Lansing, MI 48909
N. Johnson, MDEQ, w/o Enf. Addendum
JOHNSONN@michigan.gov

ENFORCEMENT CONFIDENTIAL ADDENDUM

**ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN**

NOVEMBER 2011

(REDACTED 3 PAGES)

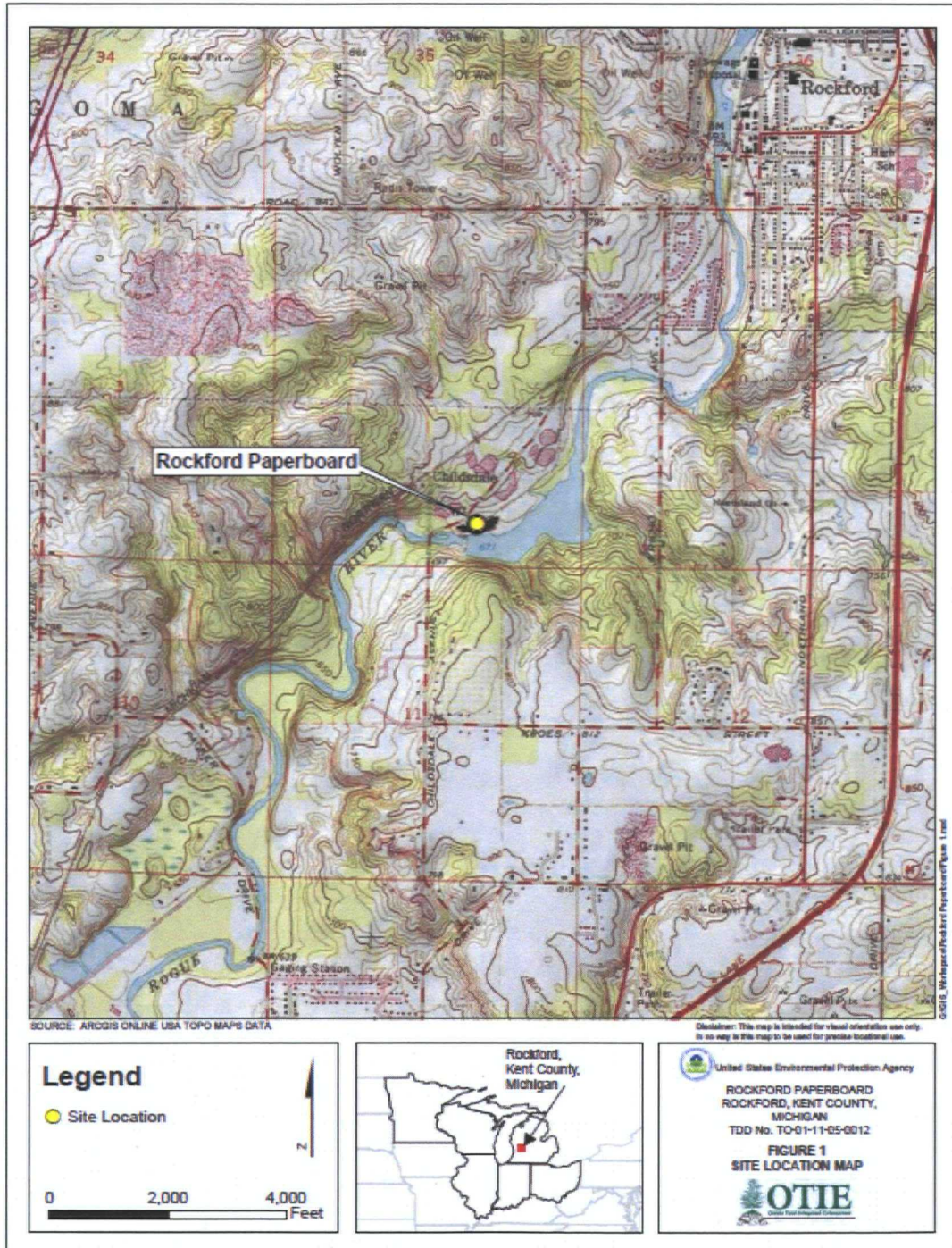
**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

FIGURE A-1

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

SITE LOCATION MAP
ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN

November 2011



ATTACHMENT 1

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**DETAILED CLEANUP CONTRACTOR ESTIMATE
FOR
ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN**

November 2011

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Rockford Paperboard Site are as follows:

Personnel	\$ 147,580
Equipment	\$ 31,310
Other Costs	\$ 9,600
Transportation and Disposal	<u>\$ 31,000</u>
Total ERRS Contractor Costs	\$ 219,490

ATTACHMENT 2

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**ADMINISTRATIVE RECORD
FOR
ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN**

November 2011

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/24/11	O'Donnell, D. MDEQ	Kimble, J., U.S. EPA	e-mail re: Rockford Paperboard, (referral)	1
2	02/24/11	O'Donnell, D. MDEQ	Kimble, J., U.S. EPA	7700 Childsdale Redevelopment NE Redevelopment Costs (via e-mail)	11
3	07/11/11	Babu, N., OTIE	Kimble, J., U.S. EPA	Site Assessment Report for the Rockford Paperboard Site	111
4	09/07/11	Kimble, J., U.S. EPA	Johnson, N., MDEQ	Letter re: U.S. EPA Request for MDEQ Identify all ARARs for the Rockford Paperboard Site	1
5	09/08/11	Johnson, N., MDEQ	Kimble, J., U.S. EPA	Michigan's Chemical, Action and Location Specific Response Actions Summary (Revision 1: January 2000)	14
6	00/00/00	Kimble, J., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Rockford Paperboard Site (PENDING)	

ATTACHMENT 3

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**REGION 5 SUPERFUND ENVIRONMENTAL JUSTICE ANALYSIS
FOR
ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN**

**ORIGINAL
November 2011**

Rockford Paperboard EJSeat 2011



ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE

**ROCKFORD PAPERBOARD SITE
ROCKFORD, KENT COUNTY, MICHIGAN**

NOVEMBER 2011

(REDACTED 2 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION